

EXHIBIT 8

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NIKE, INC.,

Plaintiff,

v.

No. 1:22-CV-00983-VEC

STOCKX LLC,

Defendant.

VIDEOTAPED DEPOSITION OF LAURA RIZZA

Taken in behalf of the Defendant

February 1, 2023

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1 BE IT REMEMBERED THAT pursuant to Federal
2 Rules of Civil Procedure, the deposition of LAURA
3 RIZZA was taken before Julie A. Walter, CSR No.
4 90-0173 on February 1, 2023, commencing at the hour
5 of 9:42 a.m., the proceedings being reported in the
6 law offices of Stoel Rives, 760 SW Ninth Avenue,
7 Suite 3000, Portland, Oregon.

8 * * *

9 APPEARANCES

10 DLA PIPER

11 Mr. Marc Miller
12 1251 Avenue of the Americas
13 New York, New York 10020
14 Counsel for the Plaintiff

15
16 DEBEVOISE & PLIMPTON LLP

17 Mr. Christopher Ford
18 650 California Street
19 San Francisco, California 94108

20 Ms. Mai-Lee Picard
21 919 Third Avenue
22 New York, New York 10022
23 Counsel for the Defendant
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25

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1 THE WITNESS: How do you mean?

2 Q. BY MR. FORD: [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 MR. MILLER: Objection.

7 THE WITNESS: [REDACTED]

8 [REDACTED]

9 Q. BY MR. FORD: Like what?

10 A.

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Is that right?

19 MR. MILLER: Objection.

20 THE WITNESS: It really depended on the
21 circumstance. I don't really feel comfortable
22 generalizing.

23 Q. BY MR. FORD: [REDACTED]

[REDACTED]

25 MR. MILLER: Objection.

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1 THE WITNESS: Not really.

2 Q. BY MR. FORD: So that's what I'm trying to

3 understand is is it the case that it was -- [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

8 MR. MILLER: Objection to form.

9 THE WITNESS: [REDACTED]

[REDACTED]
[REDACTED]

12 Q. BY MR. FORD: [REDACTED]

[REDACTED]
[REDACTED]

15 A. Not specifically.

16 Q. But generally?

17 MR. MILLER: Objection.

18 THE WITNESS: I'm not sure.

19 Q. BY MR. FORD: Okay. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

25 MR. MILLER: Objection to form.

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1 and start again.

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6 MR. MILLER: Objection.

7 THE WITNESS: Yes.

8 Q. BY MR. FORD: Who else?

9

A.

10

11 Q. And who is -- who is Ms. -- well, maybe we can
12 spell that for the reporter. I think I know the
13 spelling.

14 A. Yeah, it's Marie-Ange, hyphenated, A-N-G-E, and
15 it's B-O-Y-E-R.

16 Q. And who is Ms. Boyer?

17 A. She is a member of NIKE's brand protection team,
18 and I'm not sure what her title was at that time or
19 what it is now.

20

Q.

21

22 MR. MILLER: Objection.

23

THE WITNESS:

24

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1 Q. BY MR. FORD: [REDACTED]

2 [REDACTED]

3 MR. MILLER: Objection.

4 THE WITNESS: [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 Q. BY MR. FORD: [REDACTED]

8 [REDACTED]

9 MR. MILLER: Objection.

10 THE WITNESS: [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 Q. BY MR. FORD: I see. [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED] Is that --

17 A. I wouldn't say that.

18 MR. MILLER: Hold on.

19 Objection.

20 Q. BY MR. FORD: [REDACTED]

21 [REDACTED]

22 MR. MILLER: Objection.

23 THE WITNESS: [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 Q. Okay. And what did you do upon arriving to the
2 address? I assume that this is the address where

3 [REDACTED]

4 A. Yes, that's correct.

5 Q. [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 THE WITNESS: I don't remember.

2 Q. BY MR. FORD: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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1	A. Yes.
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2	Q. When was that?
---	-------------------

3 A. If memory serves, I believe it was in July.

4	Q.	
---	----	--

[REDACTED]

--	--	--	--

24 A. At that time we were moving pretty quickly, so the

25 products that were flagged as counterfeit were set

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1 A. Yeah, I believe that's correct.

2 Q.

█ █ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ █ [REDACTED]

█ █ [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED]

█ [REDACTED]

█ █ [REDACTED]

█ █ [REDACTED]

█ [REDACTED]

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█ [REDACTED]

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1 Q. BY MR. FORD: Sure. I know it was a long question.

2 Do these two pages that are titled "Identified
3 May 27th, 2022," pairs 1 through 15 set out all of
4 the counterfeit or allegedly counterfeit product
5 that you identified -- sorry, NIKE product that you
6 identified during your May 27th, 2022, visit to the
7 [REDACTED] ?

8 MR. MILLER: Objection to form.

9 THE WITNESS: Yes.

10 Q. BY MR. FORD: If you look at this, there are
11 columns from the Excel spreadsheet. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

15 Why were there columns specifically for "StockX
16 Tag" and "StockX Receipt" in this spreadsheet?

17 A. I was trying to document what was in the boxes.

18 Q. For the items where there is a no under StockX
19 receipt, does that mean there was no receipt of any
20 kind in the boxes or just that there was no StockX
21 receipt in the boxes?

22 A. There was no receipt of any kind.

23 Q. Other than the items that are photographed here,
24 was there anything in these boxes of any kind, or
25 is this a complete documentation of what you saw in

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1 these product boxes?

2 A. I did my best to do a complete documentation of
3 what I found in the boxes.

4 Q. So if we look at the Pair 1, [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 A. Right.

8 Q. Was that your determination?

9 A. [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 A. I don't --

15 MR. MILLER: Objection.

16 THE WITNESS: [REDACTED]

17 [REDACTED]

18 Q. BY MR. FORD: Okay. [REDACTED]

19 [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED] [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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Q. And did you take -- did you take all of these
photographs?

3

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A. I did, yes.

5

Q.

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A. Yes.

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Q. Okay. So does this, these 48 pairs, reflect all of
the counterfeit or allegedly counterfeit NIKE
product that you identified during the July 22nd,
2022, [REDACTED]?

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MR. MILLER: Objection.

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THE WITNESS: That's correct.

16

Q. BY MR. FORD: Okay. So for all of these products,
both the ones from [REDACTED]

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MR. MILLER: Objection.

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THE WITNESS: [REDACTED]

24

25

Q. BY MR. FORD: To your knowledge, did anyone else at